

## REMARKS

Applicants have amended claim 4 to include the same claim limitation as added to claim 1 in the amendment filed August 12, 2005. No new matter has been added, and no new issues have been raised. Applicants respectfully request entry of this amendment.

Claims 1-7 have been rejected under 35 USC 102(e) as anticipated by U.S. Patent No. 6,674,178 (Ikegami). Applicants respectfully traverse this rejection.

In the amendment filed August 12, 2005, applicants amended claim 1 to recite applying, after the application of the pressure to the peripheral portion, a pressure to a central portion of the back surface of the semiconductor chip and explained that claim 1 recites two different steps of pressure application, i.e., applying a pressure to the peripheral portion of the back surface of the semiconductor chip and applying a pressure to the central portion of the back surface of the semiconductor chip. Because of this two-step pressure application, the claimed manufacturing method prevents the sealing resin from penetrating into the space between the claimed first and second electrodes. The Examiner admits that Ikegami does not teach or suggest a two-step pressure application and that all Ikegami teaches is an application of a pressure to the peripheral portion and the central portion at the same time. See paragraph 3 of the Action. Applicants agree with the Examiner and note that such a one-step pressure application cannot achieve the prevention of the penetration of a sealing resin between two contacting electrodes, which is accomplished by the claimed method.

Nonetheless, the Examiner contends that the claim 1 does not recite the two-step pressure application. Applicants respectfully disagree. Claim 1 expressly sets forth the order of the pressure application by stating that the pressure to the central portion is applied "after the application of the pressure to the peripheral portion." The explicit claim language thus states that the pressure to the peripheral portion of the back surface of the chip is first applied, and then the pressure to the central portion of the back surface is applied. It is hard for applicants to see how they could have been clearer. On the other hand, Ikegami's method, according to the Examiner's

theory described in paragraph 3 of the Action, applies a pressure to the peripheral and central portions starting at the same moment in a single pressure application step when Ikegami's collet 24 holding the chip 11 by suction presses the chip 11 against interconnection board 14.

Ikegami does not teach or suggest the claimed two-step pressure application. Claim 4 as amended recites the two-step application of a positive pressure just like claim 1. Thus, the rejection of claims 1-7 under 35 USC 102(e) on Ikegami should be withdrawn.

In light of the above, a Notice of Allowance is solicited.

In the event that the transmittal letter is separated from this document and the Patent and Trademark Office determines that an extension and/or other relief is required, applicants petition for any required relief including extensions of time and authorize the Commissioner to charge the cost of such petitions and/or other fees due in connection with the filing of this document to

**Deposit Account No. 03-1952**, referencing Docket No. **606402017800**.

Respectfully submitted,

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